

EXHIBIT D

LENOX, SOCEY, FORMIDONI, GIORDANO, COOLEY, LANG & CASEY

A LIMITED LIABILITY COMPANY

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January 17, 2014

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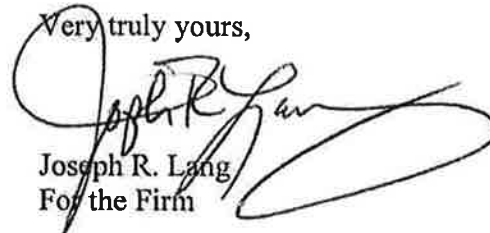
Re: Rivera v Bhagat
MDL No. 1:13-md-2419-FDS

Dear Counsel:

I am in receipt of plaintiff's request for Dr. Bhagat to provide answers to supplemental interrogatories in the above referenced matter. Kindly be advised that Dr. Bhagat will not be answering any discovery requests in this case. Since you saw fit not to name him as a defendant in the Short Form Complaint, Dr. Bhagat has no obligation to provide any discovery responses made by your firm.

Please be guided accordingly.

Very truly yours,



Joseph R. Lang
For the Firm

JRL:klm

cc: Stephen A. Grossman, Esq.